



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

August 17, 2011

Ms. Suzanne B. Herron, P.E., CPESC
Director
Environmental Division
Tennessee Department of Transportation
505 Deaderick Street, Suite 900
Nashville, TN 37243

SUBJECT: Interstate 55 Interchange at E.H. Crump Boulevard and South Riverside Boulevard

Dear Ms. Herron,

The U.S. Environmental Protection Agency (EPA) has reviewed the referenced Final Environmental Impact Statement (EIS) in accordance with its responsibilities under Section 309 of the Clean Air Act and Section 102(2) (C) of the National Environmental Policy Act (NEPA). The U.S. Department of Transportation, Federal Highway Administration and Tennessee Department of Transportation propose to improve the I-55 Interchange at E.H. Crump Boulevard (State Route 15/U.S. 64) and South Riverside Boulevard within the western edge of the City of Memphis in Shelby County, Tennessee. The existing I-55 interchange is a full cloverleaf design with loop ramps in all four quadrants. The proposed project would involve reconfiguring the cloverleaf design of the existing I-55 interchange into a configuration that reduces crashes, relieves congestion and provides route continuity of I-55 by eliminating the need for mainline I-55 traffic to utilize single-lane, low-speed ramps.

The alternatives considered include one No- Build Alternative and two Build Alternatives (A and B). The No-Build Alternative includes minor changes to the existing interchange such as safety enhancements and routine maintenance. No substantial changes to the interchange would be conducted under this alternative. The Build Alternative A consists of modifications to the I-55 Interchange that would improve traffic movements along and between the I-55 and McLemore Interchange and the Mississippi River Bridge. Build Alternative A would require the construction of three new structures, construction of substantial retaining walls, relocation of approximately eight residences and two businesses, and elimination of the existing ramps to the nearby Metal Museum. Build Alternative B is a similar design as Alternative A, but incorporates modifications so that Southbound I-55 motorists would be provided continuous access to E.H. Crump Boulevard by including an outside auxiliary road that would cross under the four-lane structure. Unlike Alternative A, Alternative B doesn't provide direct access to the residential and commercial properties on Illinois Avenue from I-55. The Alternative B design would require relocation of nine residences and one business. Unlike Alternative A, Alternative B maintains the continuity of E.H. Crump Boulevard by eliminating two at-grade intersections and

provides more direct access to E.H. Crump Boulevard and South Riverside Boulevard. Two additional alternatives were added to the final document, they are Alternative Z, and Alternative Z-1, with Alternative Z-1 as the preferred alternative. We support the selection of the Z-1 alternative since it provides design changes that shifts through traffic from the I-55 interchange to avoid the residence and businesses in the French Fort Neighborhood. The Z-1 alternative has support from local officials and the local communities'. This alternative also avoids the displacement issues associated with community relocation while meeting the *Purpose and Needs* presented by TDOT.

Based on our review of the Final EIS, EPA agrees with the selection of Alternative Z-1 as the preferred alternative. Also, we recommend that environmental concerns with mobile source air toxics (MSATs) and noise issues continue to be considered as the project design proceeds. (See detailed comments).

We appreciate the opportunity to review the proposed action. Please contact Larry Long at (404) 562-9460 or me if you have any questions about our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "H. Mueller", with a stylized flourish at the end.

Heinz J. Mueller, Chief
NEPA Program Office
Office of Policy and Management

Enclosures

**Interstate 55 Interchange at E.H. Crump Boulevard and South Riverside Boulevard
At South Riverside Boulevard in Memphis, Shelby County, Tennessee**

U.S. Environmental Protection Agency—Comments

Climate Change:

On page 81, 3.9.1.6 is labeled as “Global Warming”, but “Climate Change” is a more accurate term.

Noise Impacts:

1. Sections 3.10.6 and 3.10.7 state that there are no direct or indirect impacts associated with alternative Z-1; however this conclusion is not supported by scientific documentation.
2. EPA encourages TDOT to further analyze the use of buffer zones and better describe the cost differences between buffer zones and noise barriers.

Hazardous Waste:

On page 111 (3.17.1.2), there is a discussion regarding a hazardous waste field survey; however, there are no details regarding who conducted the field survey or the date of the field survey. Is this field survey included within the aforementioned Technical Report? Is this field survey available to the public? EPA recommends that the field survey be made available to the public.

Air Impacts:

Page 60, Unavailable Information for Project Specific MSAT Impact Analysis. We continue to be concerned that the MSAT issue is not fully addressed. The discussion of MSATs in the Draft EIS and in the air quality technical report presents information that does not coincide with the opinions of many air quality professionals, academics, and the editorial boards of scholarly journals. Air toxics impacts for a project of this magnitude should be evaluated based on emissions, dispersion modeling, and screening level risk assessment in locations where people work and reside. The evaluation should include a detailed discussion of the evidence concerning near-roadway health impacts and the potential for such impacts during and following completion of this project. Our specific recommendations include: 1) comparison of alternatives regarding potential impacts related to MSATs, 2) quantifying the construction and operational emissions for MSATs, 3) determining dispersion, emissions and exposure levels of the most significant MSATs, and 4) identifying appropriate avoidance, minimization, and/or mitigation opportunities.

Appendix B: Coordination Letters

EPA comment letters should be part of the official Record. EPA wants to ensure that the public is afforded an opportunity to review EPA’s and other public agency’s comments and recommends that TDOT include them in the FEIS.